

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 12, 2012

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Meridian International Center's (MIC) Global Leadership Summit and 44th Annual Ball on October 12, 2012

On October 12, 2012, the Meridian International Center (MIC), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host its Global Leadership Summit at the Ronald Reagan Building, in Washington, D.C., and its 44th Annual Ball, at the Bahrian Embassy of Bahrain, in Washington, D.C.

Approximately 3000 people have been invited to attend, including members of Congress, senior members of the diplomatic corps, senior officials of international organizations, leaders of industry, and media. The estimated cost of this event, including all food and beverages, is \$180.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

MIC provides a forum for leaders from both public and private sectors to discuss significant global issues. Accordingly, attendance by invited NASA employees and their guests will provide them with the opportunity to exchange views concerning NASA's policies and plans with key personnel involved in various global initiatives. Accordingly, their attendance will further Agency programs or operations.

NASA employees whose duties do not substantially affect the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone